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Attorneys for Defendants City of Chico,  
Mark Bass, and David Bailey

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

G. I. S. E. by and through his guardian  
ad litem, EDDIE SANCHEZ,

Plaintiff,

vs.

CITY OF CHICO, CHICO POLICE  
DEPARTMENT, MARK BASS,  
DAVID BAILEY, and DOES 1-50,

Defendants.

CASE NO.: 2:22-cv-01654-JDP

JOINT STIPULATION TO STAY  
ALL PROCEEDINGS AND COURT  
DEADLINES

1 The above-captioned Plaintiff(s) and Defendant(s) (hereafter, the “Parties”),  
2 by and through their respective counsel, hereby stipulate and request as follows:

3 WHEREAS, Plaintiff’s Counsel, Stanley Goff, suffered a life-threatening  
4 incident on November 29, 2024;

5 WHEREAS, Mr. Goff was admitted to the intensive care unit (the “ICU”) at  
6 Zuckerberg General Hospital on that day;

7 WHEREAS, Mr. Goff remains at the ICU and is currently receiving critical  
8 medical care due;

9 WHEREAS, Mr. Goff will need to undergo an extensive recovery period  
10 following said care;

11 WHEREAS, at the time of the above incident, the parties were still in the  
12 process of completing discovery; and

13 WHEREAS, said unforeseen circumstance constitutes good cause to stay all  
14 pending proceedings and deadlines in the above-captioned for a period of three (3)  
15 months.

16 NOW, THEREFORE, the Parties hereby stipulate, agree, and respectfully  
17 request that:

- 18 1. The Court stay the litigation, including all proceedings and deadlines, in all  
19 respects, for the next ninety (90) days in the above-captioned matter; and
- 20 2. That the Court set a Case Management Conference in early April 2025, per  
21 the availability of the Court, for a status update on this matter and to reset  
22 deadlines.
- 23 3. The Parties will also agree to provide the Court an updated joint case  
24 management conference statement seven (7) days in advance of said Case  
25 Management Conference with a status update and a proposed scheduling order  
26 for any deadlines impacted by this stay.

27 IT IS SO STIPULATED.  
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Respectfully submitted,  
Dated: December 9, 2024  
LAW OFFICE OF FULVIO F. CAJINA  
By: /s/ Fulvio Cajina  
FULVIO CAJINA  
Attorney for Plaintiff

Dated: December 9, 2024  
ALVAREZ-GLASMAN & COLVIN  
By: Sharon Medellín  
Sharon Medellín  
Attorneys for Defendants,  
City of Chico, Mark Bass, and  
David Bailey

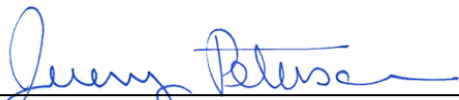
**~~PROPOSED~~ ORDER**

**PURSUANT TO STIPULATION, IT IS ORDERED:**

1. Finding good cause, this matter is stayed, including all proceedings and upcoming deadlines, in all respects, until March 20, 2025 absent further order by the court; and
2. A Case Management Conference is set for April 10, 2025. The Parties are ordered to file a joint case management statement seven (7) days prior to the Case Management Conference wherein the Parties will provide the Court an update and propose an amended scheduling order for any deadlines impacted by this stay.

IT IS SO ORDERED.

Dated: December 20, 2024

  
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JEREMY D. PETERSON  
UNITED STATES MAGISTRATE JUDGE